

UNITED STATES DISTRICT COURT

for the
Western District of TennesseeUnited States of America
v.

Osbie Sea, a/k/a "Hard Money"

Defendant

Case No. 13-20148-STA

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 2/28/2013 in the county of Shelby in the Western District of
Tennessee, the defendant violated 18 U. S. C. § 1591(b)(2)
an offense described as follows:

Child sex trafficking

This criminal complaint is based on these facts:

See attached affidavit, incorporated fully by reference herein

✓ Continued on the attached sheet.



Complainant's signature

Michael D. Saltzman, FBI Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: April 18, 2013City and state: Memphis, TN

s/ Tu M. Pham

Judge's signature

Tu M. Pham, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

STATE OF TENNESSEE

COUNTY OF SHELBY

Case No. _____

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael David Saltsman, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter referred to as the FBI), United States Department of Justice, and have been so employed since September 2, 2008. I am currently assigned to the FBI Memphis Division's Public Corruption, Civil Rights Squad and am responsible for investigating crimes related to human trafficking. I have been the primary investigator in several significant human trafficking investigations and have testified on multiple occasions regarding these investigations. I have received extensive training in criminal investigations, specifically in the area of human trafficking of minors.

2. The information contained in this affidavit is based on my personal knowledge of the events set forth herein, and information provided to me by other law enforcement personnel, cooperating individuals and other sources of information. Due to this affidavit being submitted for the purpose of establishing probable cause, I have not included each and every fact known to me or other law enforcement personnel concerning this investigation.

3. I submit this affidavit in support of my belief that there is probable cause to believe that Osbie Antonio Sea violated of Title 18, U.S.C., Section 1591 (sex trafficking of children or by force, fraud, or coercion) in the Western District of Tennessee.

4. On 03/25/2013, the Shelby County Sheriff's Department (SCSO) responded to a complaint from D.F. (identified by initials to protect the identity of his granddaughter, a sex trafficking victim) concerning a possible assault/domestic violence matter involving his granddaughter, M.S. (identified by initials to protect the identity of a juvenile sex trafficking victim). D.F. is the legal guardian of M.S. D.F. stated that M.S. had run away from home approximately four weeks ago with only the clothes she was wearing. D.F. stated that when M.S. returned home, he noticed that she had "some new hot pants" and fancy panties in her bag along with other clothing items. D.F. stated that M.S. had inappropriate pictures of herself and another young girl posted on a social media website known as "Backpage." D.F. stated that "it looks like M.S. is in a hotel room in the pictures on Backpage." D.F. was concerned that M.S. may have been involved in prostitution.

5. On 04/03/2013, M.S. was interviewed by the Affiant. M.S. stated that, on approximately 02/28/2013, while she shopped at the K-Mart store in the Raleigh area of Memphis, Tennessee, she was approached by an individual that identified himself as "Money." During the encounter, "Money" handed M.S. a flyer and told her to give him a call if she wanted to make some money. A short time later, D.F. and M.S. got into an argument and M.S. decided to run away. Due to the fact that M.S. had nowhere to go, she contacted "Money" on the telephone on the flyer.

6. M.S. stated that "Money" and an unknown white female picked her up in a large white van near her residence in Millington, Tennessee. M.S. was transported to an apartment complex in the Frayser area of Memphis, Tennessee. The following day, M.S. was transported to the Extended Stay America (ESA) near the intersection of Kirby Parkway and

Poplar Avenue in Memphis, Tennessee. M.S. stated that "Money" and the unknown female knew that she was underage but told her to tell everyone that she was eighteen because "he knew he could get in trouble." M.S. noticed that "Money" and the unknown female had a child together and were saving money to put a down payment on a house together.

7. Once at the ESA, the unknown female told M.S. that they were going to take pictures of her to post on the Internet. While the photographs were being taken, "Money" instructed M.S. on how to pose and look sexy. M.S. was told that she was going to be posted on the Internet under the name Angel. M.S. was introduced to "Brooke," another female that worked as a prostitute for "Money" and the unknown female. "Brooke" was posted on the Internet under the name of Krystal.

8. "Money" and the unknown female posted all of the advertisements on the Internet using an iPhone. As customers contacted the number from the advertisement, the unknown female put them through a "screening process," where they were required to send a text message picture of their penis with three fingers on it to prove they were not associated with law enforcement.

9. M.S. stated that she met and had sexual intercourse with two clients over the course of the three days she was with "Money" and the unknown female. As each client arrived at the location, Brooke took the money and waited in the bathroom while M.S. had sex with the client. If a client arrived to meet with Brooke, M.S. took the money and waited in the bathroom until the date was over. M.S. stated that Brooke met approximately "six or seven" clients each day. "Money" and the unknown female charged clients \$80 for a "quickie," \$100 for half an hour, \$150 for a full hour, or \$200 for two girls at the same time.

At some point, "Money" would return to the location and take possession of all of the money they had made. During this time period, "Money" and the unknown female provided M.S. and Brooke with a place to stay, food to eat, marijuana to smoke, and alcohol to drink. Brooke told M.S. that "Money" had physically assaulted her on at least one occasion.

10. On 04/09/2013, M.S. was interviewed for a second time by the Affiant. M.S. identified "Money" as Osbie Antonio Sea, aka Hardmoney CEO. M.S. was shown a copy of Hardmoney CEO's Facebook page and was able to identify him as the person from the K-Mart.

11. On 04/09/2013, M.S. identified the unknown white female as L.C (identified by initials to protect the identity of a sex trafficking victim). M.S. noticed that, on Hardmoney CEO's Facebook page, listed under the relationship section, was a picture of L.C.

12. M.S. identified Brooke as B.L., aka Krystal (identified by initials to protect the identity of a sex trafficking victim).

13. During the second interview, M.S. provided the Affiant with the flyer that "Money" had given to her at the K-Mart. The flyer contained the name "Hardmoney Takeova," and listed telephone number and . The flyer also listed usernames for Hardmoney on the Internet websites Twitter, YouTube, Facebook, and an unknown website.

14. Based on the flyer, the Affiant viewed several YouTube videos of Osbie Sea and several of his associates. In one of the videos, Sea is seen walking down a hallway, discussing the fact that he has women that make money for him. In the video, Sea displays

several \$100 bills and appears to be recruiting women to come and work for him. In another video, several of the women that work for Sea, including L.C., appear on a bed performing various sexual acts on each other. In the same video, cash and vehicles are displayed throughout.

15. Based on subpoena returns from Backpage, the Affiant determined that on 03/01/2013, at 5:21PM, the advertisement containing the photographs of M.S. was posted under the headline "80 in/call Your fantasy! ///Ashley /// Hot and ready. – 19." The text of the advertisement contained the telephone number [REDACTED] Based on interviews and database checks, it was determined that the aforementioned telephone number belongs to L.C. The advertisement contains five pictures of M.S. wearing only a towel posing in different positions. M.S. verified that the pictures were the ones that had been taken of her by Sea and L.C. In the invoice portion of the advertisement, the email address used to post the advertisement was [REDACTED] During a subsequent interview of L.C.; she confirmed that her telephone number is [REDACTED] and that her email address is [REDACTED] L.C. stated that she posted the advertisement at the direction of Sea.

16. On 04/15/2013, officers of the Memphis Police Department (MPD) responded to an incident at [REDACTED] Once on scene, L.C.'s sister told officers that Sea had been hitting and strangling L.C. L.C. told officers that she and Sea had argued over a car that they had recently purchased. During the argument, Sea struck L.C. with his fist and knocked her on the bed. Sea climbed on top of L.C. and began to choke her with his hands. Sea then dragged L.C. into the bathroom by her neck and threw her into the

bathtub. L.C. stated that, at this point in the altercation, she blacked out. Once she had regained consciousness, Sea grabbed L.C. by the arm and started to pull her out of the bathtub. L.C. was able to grab a hold of the soap dish for a brief moment until it was ripped out of the wall. L.C. stated that Sea wanted her to sign over the title to the vehicle they had purchased and, she felt that, if she did so, he would kill her. At this point, L.C.'s sister arrived at the residence. As L.C. and her sister attempted to leave, Sea grabbed their four-month-old child and started to choke the child with his forearm pushing down on the child's throat against his chest. Sea then attempted to jump over the vehicle and attack L.C.'s sister. Sea told L.C.'s sister that he was going to "smash her face in and break her jaw." As Sea jumped over the vehicle, L.C.'s sister stabbed him in the arm with a knife. L.C., her sister, and the infant child were able to lock themselves in a vehicle until police arrived.



Michael D. Saltsman
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 18th day of April, 2013

s/ Tu M. Pham
UNITED STATES MAGISTRATE JUDGE